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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF WYOMING**

In re: )  
 ) Case No.: 16-20326  
POWELL VALLEY HEALTH CARE, ) Chapter 11  
INC., )  
Debtor. )

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**MOTION TO CONTINUE CONFIRMATION HEARING AND TO SET  
TELEPHONIC STATUS CONFERENCE ON DEBTOR'S AMENDED  
CHAPTER 11 PLAN OF REORGANIZATION DATED SEPTEMBER 26, 2017  
[DOC. 656]**

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Powell Valley Health Care, Inc. (the "Debtor") hereby files this motion to continue confirmation hearing and to set a telephonic status conference on the Debtor's *Amended Chapter 11 Plan of Reorganization dated September 26, 2017* [Doc. 656] (the "Amended Plan") (the "Motion"), and in support thereof would show the Court as follows:

1. On May 16, 2016 (the "Petition Date"), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the "Court").

2. The Debtor has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. On October 25, 2017, the Court entered its *Order Approving Debtor's Second Amended Disclosure Statement* [Doc. 713] wherein the Court approved the Debtor's *Second Amended Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization dated September 26, 2017 for Powell Valley Health Care, Inc.* [Doc. 701].

4. On October 25, 2017, the Court entered its *Order Scheduling Confirmation Hearing, Establishing Confirmation Procedures, Setting Deadline for Filing Tardy Claims and Fixing Time for Filing Acceptances or Rejections of Amended Plan and Notice of Hearing* [Doc. 714] (the "Procedures Order") wherein the Court, among other things, set December 12, 2017, as the date for the evidentiary hearing on the Debtor's Amended Plan.

5. Since the entry of the Procedures Order, the Debtor, UMIA, the Committee and the Tort Claimants have been in extensive negotiations and are currently finalizing a settlement agreement to resolve matters related to UMIA. Indeed, the Debtor, UMIA, the Committee and the Tort Claimants are currently collecting signatures on the proposed final settlement agreement. If the settlement agreement is ultimately filed and approved by the Court, UMIA will not be filing an objection to the Debtor's Amended Plan. Further, a key provision of the settlement agreement with UMIA is that the Debtor will

request that the Court hold the hearing on approval the settlement agreement at the same time that it holds the confirmation hearing on the Debtor's Amended Plan.

6. The Debtor anticipates filing a motion for approval of the UMIA settlement agreement either concurrently with this Motion or within two business days thereafter. There is not, however, sufficient time for notice of the anticipated motion for approval of the settlement agreement with UMIA to be provided to all parties-in-interest with an opportunity to object prior to the confirmation hearing being heard on December 12, 2017.

7. The Debtor therefore requests that the Court continue the hearing on the confirmation of the Amended Plan and set a telephonic status conference on the Amended Plan for December 12, 2017 at 9:00 a.m. The Committee, the Tort Claimants, and UMIA support this request. No party in interest will be prejudiced by this request.

**WHEREFORE**, for the reasons set forth herein, the Debtor respectfully requests that the Bankruptcy Court continue the hearing Debtor's Amended Plan and set a telephonic status conference on the Amended Plan on December 12, 2017 at 9:00 a.m., and for such other and further relief as the Court deems proper.

Dated: Cheyenne, Wyoming  
December 8, 2017

MARKUS WILLIAMS YOUNG AND  
ZIMMERMANN LLC

By: /s/ Jennifer Salisbury  
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Counsel for the Debtor-in-Possession

**CERTIFICATE OF SERVICE**

The undersigned certifies that on December 8, 2017, a copy of the foregoing was served *electronically* upon **The Office of the United States Trustee** and those parties requesting notice and registered on the Court's CM/ECF system.

/s/Jennifer Salisbury  
Jennifer Salisbury